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9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 AMERICAN CIVIL LIBERTIES UNION OF  
NEVADA, a domestic nonprofit organization;  
13 CORIE HUMPHREY, an individual,

14 Plaintiffs,

15 vs.

16 CLARK COUNTY SCHOOL DISTRICT, a  
political subdivision of the State of Nevada,

17 Defendant.  
18

Case No.: 2:25-cv-00892

**STIPULATION AND**  
**[PROPOSED] ORDER**  
**TO EXTEND DISCOVERY**  
**DEADLINES PENDING**  
**SETTLEMENT NEGOTIATIONS**  
**(First Requested Extension)**

19 Parties, by and through Counsel, hereby stipulate to extend all pending deadlines for a  
20 period of sixty (60) days so that Plaintiffs ACLU of Nevada and Corie Humphrey and Defendant  
21 CCSD may continue settlement discussions and negotiations without incurring unnecessary  
22 attorney fees and costs. The requested extension is submitted in good faith and not for the purposes  
23 of delay. This is the first request to extend discovery deadlines in this matter and there is good  
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1 cause for an extension of discovery deadlines as Parties are engaged in ongoing settlement  
2 negotiations.

3 1. Counsel for Plaintiffs and Defendant CCSD have discussed the possibility of settlement in  
4 this matter.

5 2. Negotiations, which contemplate an updated graduation regalia policy and overall  
6 settlement, have been ongoing.

7 3. On June 30, 2025, counsel for Plaintiffs emailed counsel for CCSD a proposed graduation  
8 regalia policy.

9 4. CCSD counsel expects to provide Plaintiffs with a response to the proposed policy on  
10 Friday, July 11, 2025.

11 5. Parties wish to continue exploring the possibility of settlement without incurring additional  
12 time and expense litigating this matter as would be required by the current schedule.

13 6. Parties believe an extension of sixty (60) days should be sufficient.

14 7. In order to focus Parties' time and resources on potential resolution, Parties wish to extend  
15 the deadline for Parties' submission of a proposed Discovery Plan and Scheduling Order, and the  
16 related deadline to complete a Rule 26(f) conference.

17 8. On June 20, 2025, Parties filed a joint status report stating their intent to submit a proposed  
18 Discovery Plan by July 20, 2025. *See* ECF No. 33. Parties request that this deadline be extended  
19 60 days to **September 18, 2025**.

20 9. Parties have yet to confer under Fed. R. Civ. P. 26(f). The Parties will confer under Fed.  
21 R. Civ. P. 26(f) prior to submission of their proposed Discovery Plan and Scheduling Order.

22 10. Parties request that the triggering date for purposes of setting future discovery deadlines be  
23 extended for sixty (60) days. Specifically, Defendant CCSD's appearance date of May 25, 2025  
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will be applied as **Thursday, July 24, 2025**, for purposes of calculating future discovery related deadlines based on Defendant's first appearance.

11. Parties hereby agree to reasonably cooperate in the exchange of information as needed to facilitate settlement.

WHEREFORE, the parties respectfully request the Court enter an order granting an extension of discovery deadlines for sixty (60) days.

DATED this 9th day of July, 2025.

**AMERICAN CIVIL LIBERTIES  
UNION OF NEVADA**

/s/ Christopher Peterson

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*Clark County School District*

IT IS SO ORDERED: 

UNITED STATES DISTRICT JUDGE

DATED: July 10, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of July, 2025, I electronically filed a true and correct copy of the foregoing STIPULATION AND [PROPOSED] ORDER TO STAY PROCEEDINGS.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished on all participants by:

- ☒ CM/ECF
- ☐ Electronic mail; or
- ☐ US Mail or Carrier Service

/s/ Christopher Peterson  
CHRISTOPHER M. PETERSON  
An employee of the ACLU of Nevada